

# Exhibit 4

October 27, 2020

102 to 105

<p style="text-align: right;">Page 102</p> <p>1 - KEVIN LUCAS -</p> <p>2 A. Got you.</p> <p>3 Q. And do you see five names here, Ben</p> <p>4 Wilson, Evren Ery -- I can't say his last name --</p> <p>5 Eryurek, Jonathan Nelson, Nicholas Harteau, and</p> <p>6 Paul Strong? Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Were those all in OCTO?</p> <p>9 MR. GAGE: Objection. At what point</p> <p>10 in time are you talking about?</p> <p>11 MS. GREENE: This is as of November</p> <p>12 20th, 2017.</p> <p>13 A. So I know Ben Wilson was; I am</p> <p>14 familiar with him. The other names look somewhat</p> <p>15 familiar so I -- I would, yes, they were probably</p> <p>16 in OCTO.</p> <p>17 Q. Other than these individuals at</p> <p>18 Level 9, were there other technical solutions</p> <p>19 consultants at Level 9 within Cloud not listed</p> <p>20 here?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. I wouldn't be able to definitively</p> <p>23 say without looking at the document myself.</p> <p>24 Q. If you go down to Page 7, beginning</p> <p>25 with Line 284, do you know whether any of those</p>	<p style="text-align: right;">Page 104</p> <p>1 - KEVIN LUCAS -</p> <p>2 time.</p> <p>3 MR. GAGE: Right, but I don't know</p> <p>4 that the witness knows that so that's the</p> <p>5 basis of my objection is you're not be</p> <p>6 specific about when you're asking him.</p> <p>7 Q. 2017, 2018, and 2019, were there</p> <p>8 technical solutions consultants in Google Cloud</p> <p>9 outside of OCTO?</p> <p>10 A. Technical solu -- any level on the</p> <p>11 job family, yes.</p> <p>12 Q. Level 8 or 9.</p> <p>13 A. I can't confirm Level 8 or 9 outside</p> <p>14 of OCTO without doing some research, because that</p> <p>15 job family is used in other parts of Cloud.</p> <p>16 So in our go-to-market organization,</p> <p>17 that is the job family that is used for customer</p> <p>18 solutions engineer for which I think, I'm</p> <p>19 almost positive, at that point in time there</p> <p>20 were -- there was at least one director. Whether</p> <p>21 it's Level 8 or 9, I'm not sure.</p> <p>22 Q. So with respect to clust -- customer</p> <p>23 solutions engineer, is it your testimony that they</p> <p>24 also used the technical solutions consultant</p> <p>25 ladder?</p>
<p style="text-align: right;">Page 103</p> <p>1 - KEVIN LUCAS -</p> <p>2 principal technical solutions consultants at Level</p> <p>3 8 are outside of OCTO?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. I would have to look up each</p> <p>6 individual one. A couple of names sound familiar,</p> <p>7 but I would have to look it all up.</p> <p>8 Q. Have you seen this list before?</p> <p>9 A. No.</p> <p>10 Q. And so if I were to tell you that at</p> <p>11 any point over -- you know, this is different</p> <p>12 snapshots for three different years. If that each</p> <p>13 of those snapshots it showed only technical</p> <p>14 solutions consultants within OCTO, is it your</p> <p>15 testimony that there were technical solutions</p> <p>16 consultants at Levels 8 and 9 within Google Cloud</p> <p>17 outside of OCTO?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. Again I --</p> <p>20 MR. GAGE: Are you talking about a</p> <p>21 specific point in time, are you talking about</p> <p>22 today?</p> <p>23 MS. GREENE: The years that these</p> <p>24 documents reflect. These documents are again</p> <p>25 snapshots from three different periods of</p>	<p style="text-align: right;">Page 105</p> <p>1 - KEVIN LUCAS -</p> <p>2 A. Yes, that is my understanding and I</p> <p>3 think they still do.</p> <p>4 Q. And that's an Eng role?</p> <p>5 A. No, it is not.</p> <p>6 Q. Are there other roles that use the</p> <p>7 technical solutions consultant ladder?</p> <p>8 A. I am not aware of other roles within</p> <p>9 Cloud, other than the ones that I've mentioned,</p> <p>10 that use the TSC job family. There are several</p> <p>11 roles outside of Cloud that use that family.</p> <p>12 Q. Focusing on director level</p> <p>13 roles --</p> <p>14 A. Okay.</p> <p>15 Q. -- what are the substantive</p> <p>16 differences between a director in a technical</p> <p>17 solutions consultant role and a product management</p> <p>18 role?</p> <p>19 A. Oh, they're -- they're rather</p> <p>20 different roles.</p> <p>21 A product manager -- a product</p> <p>22 management director is defining the strategy of</p> <p>23 the product in the multi-tier road map and</p> <p>24 partnering with engineering to actually build</p> <p>25 according to that road map and deliver that</p>

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122 to 125

<p style="text-align: right;">Page 122</p> <p>1                   - KEVIN LUCAS -</p> <p>2       specific number, but I would say it's very, very</p> <p>3       few.</p> <p>4               Typically once you move -- or at</p> <p>5       Level 8 and above. The vast majority of</p> <p>6       people in those roles are people managers unless</p> <p>7       your role is maybe a bit nuanced or specialized or</p> <p>8       divergent in -- in some way. So, for example,</p> <p>9       I've worked with director-level chief of staff who</p> <p>10      was an individual contributor.</p> <p>11       Q.     And what significance does being an</p> <p>12      individual contributor versus being a person</p> <p>13      manager have for an individual; how is that -- how</p> <p>14      is that designation used in the decision-making</p> <p>15      process at Google?</p> <p>16           MR. GAGE: Objection.</p> <p>17       A.     Can I ask you to clarify what</p> <p>18      decision-making process?</p> <p>19       Q.     I'm trying to understand everything</p> <p>20      that may be implicated by someone having the</p> <p>21      designation of individual contributor versus</p> <p>22      manager.</p> <p>23       A.     Oh, okay.</p> <p>24           MR. GAGE: Objection.</p> <p>25           Go ahead.</p>	<p style="text-align: right;">Page 124</p> <p>1                   - KEVIN LUCAS -</p> <p>2       managers people management training from</p> <p>3       which I'm not sure if people place much</p> <p>4       significance on that aspect of it. Yeah, I -- I</p> <p>5       don't see that it's -- there's a lot of</p> <p>6       significance in it.</p> <p>7       Q.     With respect to the distinguished</p> <p>8       technical solutions consultant role --</p> <p>9       A.     Okay.</p> <p>10      Q.     -- are you aware of a minimum number</p> <p>11      of years of experience needed for that role?</p> <p>12      A.     I -- I would have to consult the</p> <p>13      guidelines. I would speculate that you said it</p> <p>14      distinguishes L 8, if I remember correctly. I</p> <p>15      would speculate it's probably somewhere between</p> <p>16      upper teens, maybe twenty.</p> <p>17      Q.     What about with respect to the L 9</p> <p>18      role?</p> <p>19      A.     I would say -- and a qualifier to</p> <p>20      that is relevant years of experience. For the</p> <p>21      L 9, I would probably say just kind of a handful</p> <p>22      more than -- than whatever that memo is.</p> <p>23      Q.     Do you know this to be the case or is</p> <p>24      this your assumption based on what you know about</p> <p>25      Google generally?</p>
<p style="text-align: right;">Page 123</p> <p>1                   - KEVIN LUCAS -</p> <p>2       A.     Apologies, I'm trying to think</p> <p>3       through like the -- the fundamental differences</p> <p>4       there.</p> <p>5           I'm saying it's not diff -- IC versus</p> <p>6       people manager isn't necessarily an -- an</p> <p>7       individual decision; it's a structural decision or</p> <p>8       a functional decision, right. So it's -- I think</p> <p>9       we could be hard-pressed to find a Level 8</p> <p>10      director saying I want to be an individual</p> <p>11      contributor and that making sense enough to</p> <p>12      actually doing that.</p> <p>13       That said, there are the nuances that</p> <p>14      I mentioned before like a chief of staff or highly</p> <p>15      specialized or nuance role whatever it may be. I</p> <p>16      would say what significance it has, I can't say</p> <p>17      too much because when I think about it from a</p> <p>18      performance or promotion perspective you're still</p> <p>19      evaluated on the expectations of your -- your role</p> <p>20      and ladder regardless of people manager versus</p> <p>21      ICs.</p> <p>22       I'm not aware of any compensation</p> <p>23      differences between people manager versus ICs.</p> <p>24      It's -- it's -- there's a slight difference in</p> <p>25      terms of training, whereby we offer people</p>	<p style="text-align: right;">Page 125</p> <p>1                   - KEVIN LUCAS -</p> <p>2       A.     Well, it's --</p> <p>3       MR. GAGE: Objection.</p> <p>4       Go ahead.</p> <p>5       A.     Without -- without looking -- I said</p> <p>6       it is speculative without looking at the -- the</p> <p>7       specific leveling guidelines; but in observation</p> <p>8       of directors we have brought into the</p> <p>9       organization, that's what leads me to that number.</p> <p>10      Q.     When we looked at the leveling</p> <p>11      guidelines earlier we didn't see a minimum number</p> <p>12      of years, correct?</p> <p>13      MR. GAGE: Objection.</p> <p>14           You can look back at the document if</p> <p>15      you'd like, but -- do you know which document</p> <p>16      that was that you're referring to, Cara?</p> <p>17      MS. GREENE: Yeah, give me one</p> <p>18      moment.</p> <p>19      THE WITNESS: I think it was 10 --</p> <p>20      no.</p> <p>21      Q.     Did you find it for the technical</p> <p>22      solutions consultant?</p> <p>23      A.     I haven't yet. I'm clicking through</p> <p>24      each tab.</p> <p>25      Q.     All right, I've got it. Give me one</p>

<p style="text-align: right;">Page 126</p> <p style="text-align: center;">- KEVIN LUCAS -</p> <p>1 moment.</p> <p>2</p> <p>3 A. I think I -- no, that wasn't the one.</p> <p>4 Q. Try Tab 26.</p> <p>5 MR. GAGE: And is that the document</p> <p>6 you were referring to in your question?</p> <p>7 MS. GREENE: It was.</p> <p>8 A. You're correct, and it is not</p> <p>9 mentioned in this document; but this document is</p> <p>10 behavioral descriptors across levels, so similar</p> <p>11 to the SWE ladder whereby we articulate</p> <p>12 complexity, scope, things like that across level.</p> <p>13 Q. Are you aware of any other document</p> <p>14 that includes leveling guidelines for technical</p> <p>15 solutions consultant?</p> <p>16 A. Not specific to technical solutions</p> <p>17 consultant. I'm trying to find the --</p> <p>18 Q. Are you aware of anything that</p> <p>19 outlines any sort of years requirement with</p> <p>20 respecting -- with respect to the leveling of</p> <p>21 technical solutions consultant?</p> <p>22 A. Nothing unique to TSCs. I apologize,</p> <p>23 that's why I'm looking a little confused, because</p> <p>24 I can't remember seeing anything that is job</p> <p>25 family-specific leveling guidelines.</p>	<p style="text-align: right;">Page 128</p> <p style="text-align: center;">- KEVIN LUCAS -</p> <p>1 right now.</p> <p>2</p> <p>3 THE WITNESS: Is that -- is that a</p> <p>4 good break for you?</p> <p>5 MS. GREENE: Sure.</p> <p>6 THE WITNESS: Does that work?</p> <p>7 MS. GREENE: Uh-huh.</p> <p>8 THE VIDEOGRAPHER: Okay. We're going</p> <p>9 off the record, the time is 3:54 New York</p> <p>10 time.</p> <p>11 (Whereupon, there was a brief recess</p> <p>12 in the proceedings.)</p> <p>13 THE VIDEOGRAPHER: The time is 4:02</p> <p>14 p.m. New York time, we're back on the record.</p> <p>15 Q. Okay. I want you to take a look at</p> <p>16 what's been marked as Exhibit 11. This is the</p> <p>17 spreadsheet and so you may by going to the</p> <p>18 upper -- there might be a Box in the upper</p> <p>19 right-hand corner that allows you to choose what</p> <p>20 format you open up in.</p> <p>21 A. Okay. Unfortunately it says "Box for</p> <p>22 office online has locked," so I can only look at</p> <p>23 it in basically a PDF view. Let me actually go</p> <p>24 back and try to right click and open differently.</p> <p>25 It does not allow me to open it</p>
<p style="text-align: right;">Page 127</p> <p style="text-align: center;">- KEVIN LUCAS -</p> <p>1</p> <p>2 Q. With respect to years of experience,</p> <p>3 are you aware of anything generally that sets</p> <p>4 forth level for -- years of experience with</p> <p>5 respect to leveling for people at the L 8 or L 9</p> <p>6 levels?</p> <p>7 A. That's -- that's what I was just</p> <p>8 trying to think through and -- let me think a</p> <p>9 little more.</p> <p>10 I can't remember anything. It's so</p> <p>11 frustrating.</p> <p>12 Q. It's okay. If you don't remember or</p> <p>13 you don't know, that's a fine answer as well. Is</p> <p>14 your answer you don't remember sitting here right</p> <p>15 now?</p> <p>16 A. I don't remember.</p> <p>17 Q. Okay. With respect --</p> <p>18 MR. GAGE: Can we take break at some</p> <p>19 point, convenient break?</p> <p>20 THE WITNESS: Thank you. Forgive me,</p> <p>21 sorry, I can't really follow.</p> <p>22 MS. GREENE: Sure, I see you drinking</p> <p>23 the Coke there. It's fine.</p> <p>24 THE WITNESS: I know.</p> <p>25 MS. GREENE: We can go off the record</p>	<p style="text-align: right;">Page 129</p> <p style="text-align: center;">- KEVIN LUCAS -</p> <p>1 differently. It's -- there's a -- when I right</p> <p>2 click, it says I can request unlock.</p> <p>3</p> <p>4 Q. Yeah. We had requested unlock for</p> <p>5 you to be open it in Excel.</p> <p>6 A. I can try here and see if I can.</p> <p>7 Q. I'm not going to ask you anything too</p> <p>8 detailed about this.</p> <p>9 A. Okay.</p> <p>10 Q. The first question, if you're able to</p> <p>11 zoom in at all, is whether you even recognize what</p> <p>12 this document is?</p> <p>13 A. I don't recognize this document,</p> <p>14 but it appears as though the content is the</p> <p>15 descriptors of how we would assess a candidate</p> <p>16 across four different attributes.</p> <p>17 MR. GAGE: And I just -- can I just</p> <p>18 note, I have a icon that says "The file is</p> <p>19 being edited with Box for office online."</p> <p>20 What does that mean?</p> <p>21 MS. GREENE: It may mean that because</p> <p>22 you opened it and we gave access --</p> <p>23 MR. GAGE: Okay.</p> <p>24 MS. GREENE: -- you -- you're able to</p> <p>25 edit it, but --</p>

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<p>Page 138</p> <p>1 - KEVIN LUCAS -</p> <p>[REDACTED]</p>	<p>Page 140</p> <p>1 - KEVIN LUCAS -</p> <p>[REDACTED]</p>
<p>Page 139</p> <p>1 - KEVIN LUCAS -</p> <p>[REDACTED]</p>	<p>Page 141</p> <p>1 - KEVIN LUCAS -</p> <p>[REDACTED]</p> <p>7 Q. I think you testified earlier that</p> <p>8 the salary was algorithmic?</p> <p>9 A. So it's -- as I've seen it happen, it</p> <p>10 is a trick -- it's a spreadsheet by which you</p> <p>11 essentially enter these data points, right. Like</p> <p>12 you enter the job code for widget inside and out,</p> <p>13 all of the back-end MRPs, so it will actually</p> <p>14 populate what the offer should be without</p> <p>15 considering any -- any other information and that</p> <p>16 becomes kind of your starting point in most cases.</p> <p>17 Q. So what are the factors that are</p> <p>18 entered into, what are the data points that are</p> <p>19 entered in to calculate what the starting point</p> <p>20 for the compensation discussion should be?</p> <p>21 And I'm specifically looking at</p> <p>22 hiring right now.</p> <p>23 A. Sure.</p> <p>24 Q. We'll come back to comp discussions</p> <p>25 in the course of the, you know, performance</p>

<p style="text-align: right;">Page 142</p> <p>- KEVIN LUCAS -</p> <p>1 year --</p> <p>2 A. Sure.</p> <p>3 Q. -- but right now I'm looking at</p> <p>4 hiring.</p> <p>5 A. Sure, sure. So for new hire comp, as</p> <p>6 I understand it, they enter the job code and the</p> <p>7 location, because the job code already has level</p> <p>8 factored into it because you have a different job</p> <p>9 code for each level. So the job code and location</p> <p>10 drives that outcome.</p> <p>11 Q. And once you've entered that in, what</p> <p>12 is relayed back out for new hires?</p> <p>13 A. Yep. So it then becomes a, quote,</p> <p>14 approved offer. So that output is then pushed</p> <p>15 through GHire back to the recruiter to say here's</p> <p>16 your approved offer that you can extend, for which</p> <p>17 recruiters have a -- a relatively narrow range for</p> <p>18 which they can negotiate based on how the</p> <p>19 candidate responds to it, but it's relatively</p> <p>20 narrow.</p> <p>21 If anything, if they need to -- to</p> <p>22 consider going outside of that range it actually</p> <p>23 has to go back to model again and to potentially</p> <p>24 additional layers of approval, but that doesn't</p> <p>25</p>	<p style="text-align: right;">Page 144</p> <p>- KEVIN LUCAS -</p> <p>1 Q. So I guess my -- a different question</p> <p>2 is: Given that Google's job titles and job code</p> <p>3 are unique to Google --</p> <p>4 A. Yup.</p> <p>5 Q. -- what external positions are they</p> <p>6 measured against?</p> <p>7 A. Yup. So we contribute to</p> <p>8 compensation surveys, like the majority of other</p> <p>9 companies do, for which we submit anonymous comp</p> <p>10 data to a third-party that essentially comes back</p> <p>11 to us to say here's what this job and level pays</p> <p>12 in this respective location, and we then decide</p> <p>13 where we target in that range that the job pays.</p> <p>14 Q. And so --</p> <p>15 A. So --</p> <p>16 Q. Go ahead.</p> <p>17 A. I just going to say so, for example,</p> <p>18 in -- in most cases we contribute data as do</p> <p>19 around 30 other companies depending on the</p> <p>20 respective job, by which you can imagine the usual</p> <p>21 suspects for Google. So for the majority of our</p> <p>22 technical roles you would see the likes of Amazon,</p> <p>23 Facebook, Apple, et cetera in -- in the mix to</p> <p>24 inform where we decide to target in the market.</p> <p>25</p>
<p style="text-align: right;">Page 143</p> <p>- KEVIN LUCAS -</p> <p>1 not happen too often, at least in observation.</p> <p>2 Q. And what are the components of the</p> <p>3 output in an approved offer?</p> <p>4 A. Salary, bonus, and equity. Although,</p> <p>5 bonus isn't a dollar that we necessarily</p> <p>6 communicate. It's a percentage that's</p> <p>7 automatically tied to the level, so that doesn't</p> <p>8 -- so new hire offers, there are three components</p> <p>9 comm -- communicated back to the recruiter for</p> <p>10 which they can extend the offer to the candidate.</p> <p>11 It is salary, bonus, and equity.</p> <p>12 The bonus is a fixed target</p> <p>13 percentage that we communicate so we don't</p> <p>14 actually communicate the dollar value to the</p> <p>15 bonus, and then salary is -- is slightly</p> <p>16 negotiable as is equity some degree. In some</p> <p>17 cases, we will consider sign-on bonuses if that is</p> <p>18 a lever that we need to pull.</p> <p>19 Q. For purposes of the -- what is it M</p> <p>20 -- MS -- MRP?</p> <p>21 A. MR, yes. Correct.</p> <p>22 Q. For purposes of the MRP, are any</p> <p>23 positions grouped together?</p> <p>24 A. Not that I'm aware of, no.</p> <p>25</p>	<p style="text-align: right;">Page 145</p> <p>- KEVIN LUCAS -</p> <p>1 Q. And how do you know what position</p> <p>2 externally you're targeting it against?</p> <p>3 A. Yeah. So the simplest way to</p> <p>4 describe it, it's almost like job descriptions</p> <p>5 that you submit to qualify or to kind of describe</p> <p>6 a -- a role.</p> <p>7 For the more common roles, you can</p> <p>8 imagine like where there's large end count like</p> <p>9 product management and -- and software</p> <p>10 engineering, that's probably where it's a little</p> <p>11 more straightforward. Whereby some of the other</p> <p>12 smaller job family roles, it's a little more you</p> <p>13 have to identify qualifiers by which you want to</p> <p>14 measure against.</p> <p>15 So said differently, you get to</p> <p>16 decide the ratio of functions that make up a role.</p> <p>17 So for like let's say solutions consultant -- and</p> <p>18 I'm making up the categories here, but I'm just</p> <p>19 going to try to articulate a point -- there's</p> <p>20 probably a consulting function that is weighted at</p> <p>21 25 percent, there's probably a project management</p> <p>22 function that's weighted as well. So it starts to</p> <p>23 form a more cross-comp -- or a company agnostic</p> <p>24 view of what roles are that form the output that</p> <p>25</p>

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<p style="text-align: right;">Page 174</p> <p>1 - KEVIN LUCAS -</p> <p>2 look different?</p> <p>3 A. Day-to-day responsibilities for</p> <p>4 software engineering don't change a whole lot from</p> <p>5 Level 8s to 9. It is similar to our conversation</p> <p>6 we previously had, whereby either the scope and</p> <p>7 visibility and impact of their role shifts in some</p> <p>8 ways.</p> <p>9 So they are probably more aligned to</p> <p>10 a higher priority product, perhaps a more kind of</p> <p>11 innovative product if you will. They may start</p> <p>12 leading a larger organization whereby more,</p> <p>13 quote/unquote, products roll up to them.</p> <p>14 So it's more about kind of scope and</p> <p>15 product prior -- priority than shifting day-to-day</p> <p>16 responsibilities from an L 8 to L 9 software</p> <p>17 engineer.</p> <p>18 Q. What are the skills necessary for an</p> <p>19 L 8 software engineer?</p> <p>20 A. Coding ability is probably the -- the</p> <p>21 fore -- the forerunner there for which they still</p> <p>22 have to go through coding interviews when code is</p> <p>23 submitted in their interview packets, et cetera,</p> <p>24 so that is probably the largest one.</p> <p>25 There's going to be elements,</p>	<p style="text-align: right;">Page 176</p> <p>1 - KEVIN LUCAS -</p> <p>2 that makes sense.</p> <p>3 Q. And with respect to the director of</p> <p>4 product management, what are the day-to-day</p> <p>5 responsibilities for a director of product</p> <p>6 management Level 8 look like?</p> <p>7 A. Level 8, yeah. There are going to be</p> <p>8 probably a few different elements there.</p> <p>9 There's going to be part of their</p> <p>10 time that's spent on strategic direction of the</p> <p>11 product and the ability defining where we want to</p> <p>12 take this product on a multi-year road map and</p> <p>13 starting to form a point of view on how we deliver</p> <p>14 that -- that road map over the next, let's say,</p> <p>15 six months to a few years.</p> <p>16 There's an element around kind of</p> <p>17 data analysis and customer feedback, so adjusting</p> <p>18 how customers are using the product or service</p> <p>19 and -- and responding to that feedback in either</p> <p>20 reactive ways to support the need we didn't meet</p> <p>21 or perhaps proactively thinking about features</p> <p>22 that we can build into the product or service that</p> <p>23 may unlock value to their business that they may</p> <p>24 not necessarily see.</p> <p>25 L 8 product managers are -- are</p>
<p style="text-align: right;">Page 175</p> <p>1 - KEVIN LUCAS -</p> <p>2 depending on which track you're on, of leading a</p> <p>3 team or organization. You're probably gonna to</p> <p>4 see elements of strategic thinking to execution</p> <p>5 because you have to be able to work with product</p> <p>6 managers on -- on kind of building up that product</p> <p>7 road map, but you also have to -- with production</p> <p>8 managers on building the product road map and then</p> <p>9 working with frontline engineers to actually code</p> <p>10 the products themselves.</p> <p>11 So it's a pretty interesting blend of</p> <p>12 technical depth and kind of product leadership.</p> <p>13 Q. And --</p> <p>14 MS. GREENE: Hope, can you read back</p> <p>15 the last question. Just the question, not</p> <p>16 the answer.</p> <p>17 (The question requested was read back</p> <p>18 by the reporter.)</p> <p>19 Q. And what different skills are is</p> <p>20 required of a Level 9 --</p> <p>21 MR. GAGE: Objection.</p> <p>22 Q. -- a Level 9 software engineer?</p> <p>23 A. If I -- I would probably say it's</p> <p>24 just greater depth or ability of what I just</p> <p>25 mentioned. So similar buckets, just more of if</p>	<p style="text-align: right;">Page 177</p> <p>1 - KEVIN LUCAS -</p> <p>2 people leaders, so there's not a kind of</p> <p>3 individual or technical track in the manager</p> <p>4 track; it's all one. So they're likely lead a --</p> <p>5 probably a small to medium-sized team of product</p> <p>6 managers on respective product or groups of</p> <p>7 related products.</p> <p>8 And then similar to software</p> <p>9 engineering, there's a portion of their time</p> <p>10 that's spent in kind of meeting, corroborating</p> <p>11 with Eng, talking about feasibility and product</p> <p>12 road maps, and how we actually think about</p> <p>13 building these -- these over time.</p> <p>14 Similar to software engineering, the</p> <p>15 difference between L 9 -- L 8 and L 9 is largely</p> <p>16 scope, scope -- scope, product complexity, or</p> <p>17 product portfolios that we will likely grow them</p> <p>18 into additional prod -- roles that have</p> <p>19 responsibility for additional products and/or ask</p> <p>20 them to build out more nascent products. So it's</p> <p>21 going to be the innovation side of it.</p> <p>22 Q. And I apologize if you already</p> <p>23 answered this: Is -- product management, is that</p> <p>24 considered an Eng role as you consider it?</p> <p>25 A. So Eng is most often referred to as</p>